



Kristin K. Going
212-248-3273 Direct
212-248-3141 Fax
Kristin.Going@dbr.com

Law Offices

1177 Avenue of the Americas
41st Floor
New York, NY
10036-2714

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VIA ELECTRONIC COURT FILING AND E-MAIL

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

Re: In re Motors Liquidation Company, Case No. 09-50026 (MG)

Dear Judge Glenn:

We are newly retained counsel to Wilmington Trust Company, as trust administrator and trustee (the “**Trust Administrator**”) of the Motors Liquidation Company GUC Trust (the “**GUC Trust**”). In accordance with the last paragraph of the Court’s *Memorandum Opinion and Order Regarding Motion to Enforce the Settlement Agreement By and Among the Signatory Plaintiffs and the GUC Trust*, No. 09-50026 (MG), 2018 WL 491783 (Bankr. S.D.N.Y. Jan. 18, 2018) (the “**Decision**”), we write to advise the Court concerning the status of the parties’ discussions concerning the completion of discovery and briefing on the Late Claims Motions.¹

The Trust Administrator retained Drinker Biddle & Reath LLP (“**Drinker Biddle**”) on January 25, 2018, initially to advise concerning issues related to the Decision. On February 2, 2018, the Trust Administrator terminated Gibson Dunn & Crutcher, LLP’s engagement as counsel for the GUC Trust and appointed Drinker Biddle as replacement counsel for the GUC Trust. Since its retention on February 2, Drinker Biddle has been working diligently to get up to speed on the various issues and items faced by the GUC Trust in the immediate near term. These include, but are not limited to: (i) the discovery and briefing that must occur in order to resolve the Late Claims Motions; (ii) the GUC Trust’s SEC filings, the next of which is due to be filed next week; (iii) the GUC Trust’s anticipated motion to extend the GUC Trust term and reallocate GUC Trust assets; and (vi) the next Avoidance Action mediation session, which is scheduled to proceed next week.

Because of the foregoing, Drinker Biddle is not yet able to recommend an appropriate schedule for the completion of discovery and briefing on the Late Claims Motions. We believe that we would be in a position to provide your Honor with a proposed briefing schedule for the Late Claims Motions by March 9, 2018.

We are in receipt of the letter sent to Your Honor yesterday by Edward Weisfelner, counsel to the Ignition Switch Plaintiffs and certain of the Ignition Switch Pre-Closing Accident Plaintiffs. As noted by Mr. Weisfelner, Plaintiffs were unwilling to negotiate a discovery or briefing schedule

¹ Capitalized terms used, but otherwise not defined herein shall have the meanings ascribed to such terms in the Decision.

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with the GUC Trust prior to Drinker Biddle's retention as counsel. In order to allow Drinker Biddle additional time to get up to speed, Mr. Weisfelner suggests an adjournment of the conference currently scheduled for February 22, 2018. The GUC Trust does not oppose this request.

We are available at the Court's convenience should Your Honor wish to discuss this matter.

Respectfully Submitted,

KKG/TYL

S/ Kristin K. Going
Kristin K. Going
Drinker Biddle & Reath LLP
1177 Avenue of the Americas, 41st Floor
New York, NY 10036
(212) 248-3273
Kristin.going@dbr.com